

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) INDICTMENT

Plaintiff,

v.

) CASE NO. 4 : 16 CR 088

GEORGE RAFIDI,
CHARLES R. THOMAS,
VINCENT E. POYSSICK, SR.,
ALECIA D. GAYLES,
SOPHIA L. HENDRIX,
TASHAUNA J. GRISSETT,
DONNA HENDRIX,
KATRINA HASKINS,
DEIDRA WILSON,
FAYDRA SPIKES-HILL,
JENNIFER A. LEE,
CHERYLE O'NEAL,
TORRIE L. CRUMP,
YOLETTA S. ALVARADO,
TRACEY M. ELEY,
LATISE MAHINPARVAR,
ALLISON HARRIS,
BRITTANY N. LITTLEJOHN,
TSHOMBE P. MILLER,
MONIQUE D. SUTTON,
LISA WEST,
TELISHA STANFORD,
JOANN AVERETTE,
FLOYA YESHIA ROBINSON,
HERMAN L. TAYLOR, JR.,
EARLENE WILLIAMS,
DOREEN MAYBERRY,
JESSICA DICKERSON,

) 7 U.S.C. § 2024(b)
7 U.S.C. § 2024(c)
18 U.S.C. § 2
18 U.S.C. § 371

JUDGE LIGO

TIFFANY WILLIAMS,)
HARRIET RANDOLPH,)
JAMALIA ABRAMS,)
TEARRA DATES,)
Defendants.)

COUNT 1

The Grand Jury charges:

1. Beginning in or around June 2010, and continuing through in or around October 2014, in the Northern District of Ohio, Eastern Division, and elsewhere, defendants GEORGE RAFIDI, CHARLES R. THOMAS, VINCENT E. POYSSICK, SR., ALECIA D. GAYLES, SOPHIA L. HENDRIX, TASHAUNA J. GRISSETT, DONNA HENDRIX, KATRINA HASKINS, DEIDRA WILSON, FAYDRA SPIKES-HILL, JENNIFER A. LEE, CHERYLE O'NEAL, TORRIE L. CRUMP, YOLETTA S. ALVARADO, TRACEY M. ELEY, LATISE MAHINPARVAR, ALLISON HARRIS, BRITTANY N. LITTLEJOHN, TSHOMBE P. MILLER, MONIQUE D. SUTTON, LISA WEST, TELISHA STANFORD, JOANN AVERETTE, FLOYA YESHIA ROBINSON, HERMAN L. TAYLOR, JR., EARLENE WILLIAMS, DOREEN MAYBERRY, JESSICA DICKERSON, TIFFANY WILLIAMS, HARRIET RANDOLPH, JAMALIA ABRAMS, and TEARRA DATES; along with other persons known and unknown to the Grand Jury, did knowingly and intentionally conspire together and with each other to defraud the United States and an agency thereof, that is, the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) and specifically to defraud the Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program, to commit offenses against the United States, that is: to violate Title 7, United States Code, Sections 2024(b) and 2024(c) by: (1) knowingly using, transferring, acquiring, and possessing food stamp coupons and food stamp benefits, authorization cards and

access devices of a value of \$5,000 or more in a manner not authorized by Title 7, United States Code, Section 51; and (2) presenting food stamp coupons and food stamp benefits knowing them to have been received, transferred, and used in a manner not authorized by Title 7, United States Code, Chapter 51.

INTRODUCTION

At all times material hereto:

2. The Supplemental Nutrition Assistance Program (“SNAP”), formerly known as the Food Stamp Program, was a governmental program administered by the United States Department of Agriculture (“USDA”) through the Food and Nutrition Service (“FNS”) in Ohio. Each authorized food stamp recipient in Ohio was issued an Ohio Direction Electronic Benefits Transfer (“EBT”) card that contained a unique account number and an encrypted personal identification number (“PIN”). EBT cards were similar to bank debit cards in that a food stamp recipient could purchase food from authorized retailers using the EBT card. EBT benefits were downloaded monthly to the individual Ohio Direction EBT cards. EBT benefits were intended to be used by eligible food stamp recipients to purchase food from authorized retailers.

3. Retail stores could participate in the Food Stamp Program only with the authorization of the USDA-FNS. Authorized participants in the Food Stamp Program could only accept and redeem EBT benefits in connection with the sale of eligible items; they were not authorized to accept EBT benefits from other retailers, nor could they exchange food stamp benefits for cash.

4. The Ohio EBT system was operated through a contract between the FNS and the State of Ohio. The State of Ohio maintained a primary service contract with Affiliated Computer Services (“ACS”), located in Dallas, Texas. Authorized stores were provided with a Point of

Sale electronic card-reading device that was to be used only for food stamp customers actually purchasing authorized food stamp grocery items. The EBT system electronically debited the EBT card and credited the retail food store account each time a customer used the EBT card to make a purchase at an EBT-authorized store.

5. ACS settled and reconciled each retailer at the end of the ACS business day and an Automated Clearing House file was transmitted to the ACS concentrator bank. The bank would, in turn, do its internal processing and send the funds through the federal banking system to the appropriate retailer or network bank location. Upon settlement of the day's EBT receipts, the host computer electronically transferred funds to the retail store's designated bank account as reimbursement for the EBT card transactions. As part of the Food Stamp Program, a licensed vendor accepted responsibility for violations of the Food Stamp Program regulations, including violations committed by any of the vendor's employees, including all acts of fraud and trafficking.

OBJECT OF THE CONSPIRACY

6. The objects of the conspiracy were to: (a) defraud the Supplemental Nutrition Assistance Program; (b) convert illegally obtained SNAP benefits, through the use of the Electronic Benefit Transfer (EBT) cards, into money that the defendants, their co-conspirators, and designees could use for any purpose; and (c) to enrich defendants.

MANNER AND MEANS

7. It was part of the conspiracy that on or about March 18, 2010, GEORGE RAFIDI filed articles of incorporation for Ghazy, LLC, doing business as Breaden Market, a convenience store located in Youngstown, Ohio with approximately 672 square feet of operating space.

8. It was further part of the conspiracy that on or about March 31, 2010, GEORGE RAFIDI completed and submitted a Supplemental Nutrition Assistance Program Application for Stores, for Breaden Market to the USDA FNS. Breaden Market then began operating in or about April 2010.

9. It was further part of the conspiracy that SNAP recipients or beneficiaries went to Breaden Market and obtained cash and prohibited items (such as alcohol and tobacco) in exchange for their SNAP benefits.

10. It was further part of the conspiracy that GEORGE RAFIDI, VINCENT E. POYSSICK, SR.; and CHARLES R. THOMAS fraudulently redeemed SNAP benefits and caused money to be deposited into Breaden Market's bank accounts.

11. During the course of the conspiracy, GEORGE RAFIDI and Breaden Market submitted claims for over \$2,000,000 in fraudulently obtained SNAP benefits.

OVERT ACTS

12. In furtherance of the conspiracy and in order to effect its objects, defendants and their co-conspirators committed the following overt acts in the Northern District of Ohio, and elsewhere:

13. On or about November 9, 2010, YOLETTA ALVARADO used her EBT card to obtain \$400.89 in ineligible items from Breaden Market.

14. On or about November 18, 2010, HARRIET RANDOLPH used her EBT card to obtain \$75 in ineligible items from Breaden Market.

15. On or about March 7, 2011, FAYDRA SPIKES-HILL used her EBT card to obtain \$100.50 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

16. On or about March 9, 2011, TEARRA DATES used her EBT card to obtain approximately \$150 cash for \$301 of SNAP benefits from Breaden Market.

17. On or about March 14, 2011, JAMALIA ABRAMS used her EBT card to obtain \$80 in ineligible items from Breaden Market.

18. On or about March 15, 2011, SOPHIA HENDRIX used her EBT card to obtain approximately \$50 cash for \$101 of SNAP benefits from GEORGE RAFIDI at Breaden Market.

19. On or about April 4, 2011, DONNA HENDRIX used her EBT card to obtain approximately \$200 cash for \$401 of SNAP benefits from GEORGE RAFIDI at Breaden Market.

20. On or about April 9, 2011, JENNIFER LEE used her EBT card to obtain \$59.50 in ineligible items from Breaden Market.

21. On or about May 10, 2011, BRITTANY LITTLEJOHN used her EBT card to obtain approximately \$100 cash for \$201 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

22. On or about May 10, 2011, DEIDRA WILSON used her EBT card to obtain \$174 in ineligible items from CHARLES R. THOMAS in Breaden Market.

23. On or about June 2, 2011, TASHAUNA GRISSETT used her EBT card to obtain \$701.50 in ineligible items from GEORGE RAFIDI at Breaden Market.

24. On or about June 9, 2011, JESSICA DICKERSON used her EBT card to obtain \$101.50 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

25. On or about June 15, 2011, KATRINA HASKINS used her EBT card to obtain \$235 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

26. On or about July 6, 2011, JOANN AVERETTE used her EBT card to obtain \$42 in ineligible items from Breaden Market.

27. On or about July 6, 2011, LATISE MAHINPARVAR used her EBT card to obtain \$109 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

28. On or about July 8, 2011, TORRIE CRUMP used her EBT card to obtain approximately \$300 cash for \$605 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

29. On or about July 11, 2011, LISA WEST used her EBT card to obtain \$205 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

30. On or about August 2, 2011, DOREEN MAYBERRY used her EBT card to obtain approximately \$150 cash for \$315.50 of SNAP benefits from CHARLES R. THOMAS at Breaden Market.

31. On or about August 9, 2011, FLOAYESHIA ROBINSON used her EBT card to obtain \$310.50 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

32. On or about September 10, 2011, ALECIA GAYLES allowed her EBT card to be used to obtain about \$200 cash for \$420 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

33. On or about October 13, 2011, ALLISON HARRIS, allowed her EBT card to be used to obtain \$42.50 in ineligible items from Breaden Market.

34. On or about November 17, 2011, TIFFANY WILLIAMS used her EBT card to obtain approximately \$100 cash for \$209.50 of SNAP benefits from GEORGE RAFIDI at Breaden Market.

35. On or about December 5, 2011, HERMAN L. TAYLOR, JR. used his EBT card to obtain \$148.50 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

36. On or about December 13, 2011, CHERYLE O'NEAL used her EBT card to obtain approximately \$80 cash for \$160 of SNAP benefits from VINCENT E. POYSSICK, SR. at Breaden Market.

37. On or about January 5, 2012, TRACEY ELEY, allowed her EBT card to be used to obtain \$109.63 in ineligible items from Breaden Market.

38. On or about March 8, 2012, TELISHA STANFORD used her EBT card to obtain \$46.75 in ineligible items from Breaden Market.

39. On or about April 20, 2012, MONIQUE SUTTON used her EBT card to obtain approximately \$50 cash for \$100 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

40. On or about September 8, 2012, TSHOMBE MILLER allowed his EBT card to be used to obtain \$100 in ineligible items from Breaden Market.

41. On or about October 11, 2012, EARLENE WILLIAMS used her EBT card to obtain approximately \$40 cash for \$82 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

42. On or about December 11, 2012, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave Confidential Source Number 1 (CS-1) toilet paper and food items for \$13.50 of SNAP benefits.

43. On or about December 11, 2012, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-1 \$350 cash in exchange for \$700 of SNAP benefits.

44. On or about May 21, 2013, JAMALIA ABRAMS used her EBT card to obtain \$101.01 in ineligible items from Breaden Market.

45. On or about July 15, 2013, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave Confidential Source Number 2 (CS-2) \$200 in exchange for \$400.01 of SNAP benefits.

46. On or about July 25, 2013, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-2 \$25 cash, beer and a pack of cigarettes in exchange for \$62 of SNAP benefits.

47. On or about August 8, 2013, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-2 beer, a pack of cigarettes, hot prepared food and \$389 cash in exchange for \$805 of SNAP benefits.

48. On or about August 22, 2013, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-2 \$35 cash, beer and cigarettes in exchange for \$78 of SNAP benefits.

49. On or about September 5, 2013, CHARLES R. THOMAS gave CS-2 beer, cigarettes and toilet paper in exchange for \$13.25 in SNAP benefits.

50. On or about September 5, 2013, GEORGE RAFIDI withdrew \$3,000 in cash from a bank account and took it to Breaden Market.

51. On or about September 5, 2013, CHARLES R. THOMAS, VINCENT E. POYSSICK, SR. and GEORGE RAFIDI gave CS-2 \$300 cash in exchange for \$600.02 in SNAP benefits.

52. On or about September 19, 2013, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-2 \$25 cash, beer and cigarettes in exchange for \$52 of SNAP benefits.

53. On or about September 26, 2013, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-2 beer and cigarettes in exchange for \$12.00 of SNAP benefits.

54. On or about September 26, 2013, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-2 \$100 cash in exchange for \$200.02 of SNAP benefits.

55. On or about January 13, 2014, TIFFANY WILLIAMS used her EBT card to obtain approximately \$50 cash for \$106 of SNAP benefits from CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. at Breaden Market.

56. On or about March 7, 2014, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave Confidential Source Number 3 (CS-3) beer and cigarettes in exchange for \$28.50 of SNAP benefits.

57. On or about March 7, 2014, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-3 \$100 cash and beer in exchange for \$207.00 of SNAP benefits.

58. On or about April 12, 2014, YOLETTA ALVARADO used her EBT card to obtain \$159.01 in ineligible items from Breaden Market.

59. On or about May 5, 2014, TRACEY ELEY, allowed her EBT card to be used to obtain \$95.75 in ineligible items from Breaden Market.

60. On or about May 9, 2014, JOANN AVERETTE used her EBT card to obtain \$40.50 in ineligible items from Breaden Market.

61. On or about June 20, 2014, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-3 \$20 cash in exchange for \$40.05 of SNAP benefits.
62. On or about June 24, 2014, ALECIA GAYLES, or persons at her request, used her EBT card to obtain about \$100 cash for \$207.75 of SNAP benefits at Breaden Market.
63. On or about July 3, 2014, DONNA HENDRIX used her EBT card to obtain about \$200 cash for \$410.75 of SNAP benefits from CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. at Breaden Market.
64. On or about July 10, 2014, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-3 \$100 cash, beer and cigarettes in exchange for \$235 of SNAP benefits.
65. On or about July 10, 2014, JESSICA DICKERSON used her EBT card to obtain \$144.03 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.
66. On or about August 8, 2014, TORRIE CRUMP used her EBT card to obtain about \$130 cash for \$261.01 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.
67. On or about August 12, 2014, BRITTANY LITTLEJOHN, or persons at her request, used her EBT card to obtain about \$30 cash for \$61 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.
68. On or about September 2, 2014, ALLISON HARRIS, allowed her EBT card to be used to obtain \$306.01 in ineligible items from Breaden Market.

69. On or about September 8, 2014, EARLENE WILLIAMS used her EBT card to obtain about \$100 cash for \$206.01 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

70. On or about September 9, 2014, DEIDRA WILSON used her EBT card to obtain \$82.75 in ineligible items from Breaden Market.

71. On or about September 9, 2014, MONIQUE SUTTON used her EBT card to obtain approximately \$100 cash for \$206.03 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

72. On or about September 9, 2014, TEARRA DATES used her EBT card to obtain approximately \$25 cash for \$51.39 of SNAP benefits from Breaden Market.

73. On or about September 10, 2014, HARRIET RANDOLPH used her EBT card to obtain \$209.05 in ineligible items from Breaden Market.

74. On or about September 16, 2014, FAYDRA SPIKES-HILL used her EBT card to obtain \$46.03 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

75. On or about September 19, 2014, KATRINA HASKINS used her EBT card to obtain \$213.75 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

76. On or about September 19, 2014, FLOAYESHIA ROBINSON used her EBT card to obtain \$102.50 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

77. On or about September 25, 2014, TSHOMBE MILLER allowed his EBT card to be used to obtain \$82.01 in ineligible items from Breaden Market.

78. On or about October 1, 2014, CHARLES R. THOMAS and VINCENT E. POYSSICK, SR. gave CS-3 \$130 cash, beer and cigarettes in exchange for \$292.50 of SNAP benefits.

79. On or about October 1, 2014, DOREEN MAYBERRY used her EBT card to obtain about \$100 cash for \$207 of SNAP benefits from CHARLES R. THOMAS at Breaden Market.

80. On or about October 2, 2014, TASHAUNA GRISSETT used her EBT card to obtain \$200 in ineligible items from Breaden Market.

81. On or about October 3, 2014, TELISHA STANFORD used her EBT card to obtain \$107 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

82. On or about October 3, 2014, CHERYLE O'NEAL used her EBT card to obtain approximately \$210 cash for \$420.75 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

83. On or about October 3, 2014, SOPHIA HENDRIX used her EBT card to obtain approximately \$210 cash for \$424.05 of SNAP benefits from GEORGE RAFIDI at Breaden Market.

84. On or about October 6, 2014, LISA WEST used her EBT card to obtain \$40 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

85. On or about October 6, 2014, HERMAN L. TAYLOR, JR. used his EBT card to obtain approximately \$80 cash for \$160.50 of SNAP benefits from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

86. On or about October 6, 2014, LATISE MAHINPARVAR used her EBT card to obtain \$41.75 in ineligible items from VINCENT E. POYSSICK, SR. and CHARLES R. THOMAS at Breaden Market.

87. On or about October 7, 2014, JENNIFER LEE used her EBT card to obtain \$95.01 in ineligible items from Breaden Market.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
(Food Stamp Fraud)

The Grand Jury further charges:

88. The factual allegations of paragraphs 2 through 87 of Count 1 of the Indictment are realleged and are incorporated by reference herein.

89. Beginning in or around June 2010, and continuing through in or around October 2014, in the Northern District Of Ohio, Eastern Division, defendants GEORGE RAFIDI, CHARLES R. THOMAS, VINCENT E. POYSSICK, SR., ALECIA D. GAYLES, SOPHIA L. HENDRIX, TASHAUNA J. GRISSETT, DONNA HENDRIX, KATRINA HASKINS, DEIDRA WILSON, FAYDRA SPIKES-HILL, JENNIFER A. LEE, CHERYLE O'NEAL, TORRIE L. CRUMP, YOLETTA S. ALVARADO, TRACEY M. ELEY, LATISE MAHINPARVAR, ALLISON HARRIS, BRITTANY N. LITTLEJOHN, TSHOMBE P. MILLER, MONIQUE D. SUTTON, LISA WEST, TELISHA STANFORD, JOANN AVERETTE, FLOYAYESHIA ROBINSON, HERMAN L. TAYLOR, JR., EARLENE WILLIAMS, DOREEN MAYBERRY, JESSICA DICKERSON, TIFFANY WILLIAMS, HARRIET RANDOLPH, JAMALIA ABRAMS, and TEARRA DATES, knowingly used, transferred, acquired, and possessed EBT cards with SNAP benefits, authorization cards, and access devices of a value of \$5,000 or more in a manner contrary to Title 7, United States Code,

Chapter 51 and the regulations issued thereunder, in that they acquired USDA FNS SNAP benefits through the use of EBT cards in exchange for U.S. currency and other ineligible items.

All in violation of Title 7, United States Code, Section 2024(b), and Title 18, United States Code, Section 2.

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 7, United States Code, Section 2024, the allegations of Counts 1 and 2 are incorporated herein by reference. As a result of the foregoing offenses, defendants GEORGE RAFIDI, CHARLES R. THOMAS, VINCENT E. POYSSICK, SR.; ALECIA D. GAYLES, SOPHIA L. HENDRIX, TASHAUNA J. GRISSETT, DONNA HENDRIX, KATRINA HASKINS, DEIDRÀ WILSON, FAYDRA SPIKES-HILL, JENNIFER A. LEE, CHERYLE O'NEAL, TORRIE L. CRUMP, YOLETTA S. ALVARADO, TRACEY M. ELEY, LATISE MAHINPARVAR, ALLISON HARRIS, BRITTANY N. LITTLEJOHN, TSHOMBE P. MILLER, MONIQUE D. SUTTON, LISA WEST, TELISHA STANFORD, JOANN AVERETTE, FLOYAYESHIA ROBINSON, HERMAN L. TAYLOR, JR.; EARLENE WILLIAMS, DOREEN MAYBERRY, JESSICA DICKERSON, TIFFANY WILLIAMS, HARRIETT RANDOLPH, JAMALIA ABRAMS, TEARRA DATES, shall forfeit to the United States all property, real and personal, used in a transaction or attempted transaction, to commit, or to facilitate the commission of, such offense(s); and, all proceeds traceable to such offense(s); including but not limited to:

- a. \$1,128.00 in U.S. Currency;
- b. \$22,529.00 in U.S. Currency; and,

c. Real Property located at 1026 Overland Avenue, Youngstown, Ohio, titled to
Jyres, LLC.

A TRUE BILL.

Original document -- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002